

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
Philadelphia Division

IN RE: PETER A. ADEBANJO and DORIS I. STIENE- ADEBANJO	Case No. 18-10284-amc
U.S. Bank National Association, as Trustee for SASCO Mortgage Loan Trust 2006-WF3, Movant	Chapter 13
vs.	
PETER A. ADEBANJO and DORIS I. STIENE- ADEBANJO, Debtor	

**OBJECTION TO CONFIRMATION
OF DEBTORS' CHAPTER 13 PLAN**

U.S. Bank National Association, as Trustee for SASCO Mortgage Loan Trust 2006-WF3 ("Movant"), by and through its undersigned counsel, files this *Objection to Confirmation of Debtors' Chapter 13 Plan* (Doc 90), and states as follows:

1. The Debtor filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on January 16, 2018.
2. Movant holds a security interest in the Debtors' real property located at 508 Benson Lane, Chester Springs, PA 19425 (the "Property"), by virtue of a Mortgage which is recorded as instrument Number 10670645 in Official Records of Chester County, Pennsylvania. Said Mortgage secures a Note in the amount of \$598,500.00.
3. Movant filed a Proof of Claim in this case on April 28, 2021 (Claim No. 3-2) which

lists a secured claim of \$659,854.99 and prepetition arrears of \$76,007.82.

4. The Debtors filed an Amended Chapter 13 Plan (the “Plan”) on March 28, 2022 (Doc 90) in which the Debtor includes \$76,007.82 of pre-petition arrears and \$73,662.61 of post-petition arrears curing arrears totaling \$149,670.43.

5. Based on the Schedules filed by the Debtor, the Debtor’s income has somehow increased by \$4,200.00 per month without explaining the increase. Movant, objects to the Plan for feasibility 11 U.S.C. § 1325(a)(6).

6. Movant objects to Debtors’ proposed Amended Chapter 13 Plan because the Debtor is requesting that the plan be extended to 84 months under the CARES ACT, however the CARES ACT expired and Movant questions whether the debtor can extend the plan at this time.

WHEREFORE, Movant respectfully requests the entry of an Order which denies confirmation of the Plan unless such plan is amended to overcome the objections of Movant as stated herein, and for such other and further relief as the Court may deem just and proper.

/s/Andrew Spivack

Andrew Spivack, PA Bar No. 84439

Matt Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

Jay Jones, PA Bar No. 86657

Attorney for Creditor

BROCK & SCOTT, PLLC

8757 Red Oak Boulevard, Suite 150

Charlotte, NC 28217

Telephone: (844) 856-6646

Facsimile: (704) 369-0760

E-Mail: PABKR@brockandscott.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
Philadelphia Division

IN RE: PETER A. ADEBANJO and DORIS I. STIENE- ADEBANJO	Case No. 18-10284-amc
U.S. Bank National Association, as Trustee for SASCO Mortgage Loan Trust 2006-WF3, Movant	Chapter 13
vs.	
PETER A. ADEBANJO and DORIS I. STIENE- ADEBANJO, Debtor	

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Objection To Confirmation Of Debtors' Chapter 13 Plan has been electronically served or mailed, postage prepaid on this day to the following:

PETER A. ADEBANJO
508 BENSON LN
CHESTER SPRINGS, PA 19425-3644

DORIS I. STIENE-ADEBANJO
508 BENSON LN
CHESTER SPRINGS, PA 19425-3644

Robert H. Holber, Debtor's Attorney
41 East Front Street
Media, PA 19063
rholber@holber.com

Scott F. Waterman, Bankruptcy Trustee
Chapter 13 Trustee
2901 St. Lawrence Ave, Suite 100
Reading, PA 19606
ECFMail@ReadingCh13.com

United States Trustee, US Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106
USTPRegion03.PH.ECF@usdoj.gov

April 6, 2022

/s/Andrew Spivack
Andrew Spivack, PA Bar No. 84439
Matt Fissel, PA Bar No. 314567
Mario Hanyon, PA Bar No. 203993
Ryan Starks, PA Bar No. 330002
Jay Jones, PA Bar No. 86657
Attorney for Creditor

BROCK & SCOTT, PLLC
8757 Red Oak Boulevard, Suite 150
Charlotte, NC 28217
Telephone: (844) 856-6646
Facsimile: (704) 369-0760
E-Mail: PABKR@brockandscott.com